

SHER TREMONTE LLP

December 24, 2024

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Lars Winkelbauer, et al.
(23 Cr. 133)

Dear Judge Furman:

We write on behalf of Abilash Kurien to respectfully request (1) a 13-day extension of time for Mr. Kurien to surrender for his sentence, and (2) that the Court change its designation recommendation for Mr. Kurien to FPC Montgomery in Alabama. The government does not object to either request.

The Court held a sentencing hearing in this matter on October 1, 2024. At the sentencing, counsel for Mr. Kurien requested that the Court recommend that Mr. Kurien be designated to serve his sentence at FCI Otisville in New York. ECF No. 418 at 43:5-19. The Court also recommended that Mr. Kurien be considered for the residential drug abuse or drug and alcohol abuse program (“RDAP”) at his designated facility. *Id.* at 43:20-25. At the time, counsel for Mr. Kurien did not appreciate that FCI Otisville does not offer RDAP programming. The Court sentenced Mr. Kurien to a term of 32 months with a voluntary surrender date of January 9, 2025. *Id.* at 40:16-19, 44:16-18.

Mr. Kurien now respectfully requests that the Court amend the judgment in this matter to include a recommendation that he instead be designated to FPC Montgomery. Mr. Kurien has been advised that inmates at FPC Montgomery can enroll in its RDAP soon after arrival, and Mr. Kurien wishes to begin RDAP without delay.

So as to permit the Bureau of Prisons sufficient time to re-designate Mr. Kurien, Mr. Kurien also respectfully requests that his voluntary surrender date be extended by 13 days to January 22, 2025. This is his first request for an extension.

Counsel is available should the Court have any questions. We appreciate the Court’s consideration.

The Honorable Jesse M. Furman
December 24, 2024
Page 2 of 2

Respectfully submitted,

/s/ Justine Harris

Justine Harris
Amanda Greenfield
Rebecca Prager

cc: All parties (via ECF)
Probation Officer Pamela Flemen

Application GRANTED. The Court will enter an amended judgment, but it may not be able to do so until January 2, 2025, or even January 6, 2025. In the meantime, the Government shall notify the BOP about the Court's revised recommendation and request that the Defendant be re-designated accordingly. In the event that the BOP is unwilling to do so absent the amended judgment, the Defendant may move for a corresponding extension of his surrender date to account for the delay. The Clerk of Court is directed to terminate ECF No. 448.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "J. Furman", written over the text "SO ORDERED." and above the date.

December 26, 2024